

From: Dan Allison

Sent: Tuesday, November 18, 2014 2:33 PM

To: CEQA Guidelines

Subject: comments on Updating Transportation Impacts

1. I completely agree with removal of level of service analysis and the statement "A project's effect on automobile delay does not constitute a significant environmental impact."
2. I fully support subdivision (b)(1) use of VMT analysis.
3. I fully support subdivision (b)(2) which states that "For example, projects that are primarily designed to improve safety or operations would not typically be expected to create significant impacts. The same is true of pedestrian, bicycle and transit projects, including those that require reallocation or removal of motor vehicle lanes."
4. I fully support Subdivision (b)(4) which states that "a lead agency would be expected to consider vehicle miles traveled that extend beyond the lead agency's political boundaries."
5. Appendix E: Estimating VMT From Roadway Capacity Increasing Projects (of the discussion draft) is useful and has an appropriate level of detail for initial use, but detail and specificity may need to be increased in the future.
6. The draft uses the terms "major transit stops" and "high quality transit corridors" without defining the terms. What frequency of service, hours of service, or ridership at that particular stop would define a "major transit stop?" What defines a "high quality transit corridor?" Rail? BRT? Regular bus service? Ridership?

For example, bus service on 30 or 60 minutes headways, or running only during commute hours or only during the day time, certainly does not qualify as a "high quality transit service." A bus service sign by the side of the road, without any associated facilities such as seating, shelter, transit signing, trash can, and perhaps bicycle racks, does not qualify as a "major transit stop."

Using the terms without more specific definition might encourage some agencies to claim exemption when it really doesn't apply. As an example, some agencies have claimed that a development is "transit oriented development" when it is not oriented to transit at all but simply located in proximity to transit. I can imagine that some agencies would make similar claims about "major transit stops" and "high quality transit service."

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Dan Allison